REMARKS/ARGUMENTS

The Examiner rejected claims 1-42 under the judicially created doctrine of obviousness-type double patenting. Applicants submit herewith a terminal disclaimer to overcome this rejection.

The Examiner rejected claims 1, 2, 4-16, 18-30, and 32-42 as obvious (35 U.S.C. §103) over Galea (U.S. Patent No. 6,404,445) in view of "The SGML/XML Web Page" by Robin Cover (referred to herein as "Cover"). Applicants traverse this rejection for the following reasons.

Claims 1, 15, and 29 concern generating user interface output on an output device attached to a remote computer, wherein the remote computer communicates over a network to at least one server. The claims require: receiving an object including user interface components and data from one server; generating user interface output from the user interface components and data in the object; receiving a standard application program interfaces (API) that are a member of a set of standard APIs in a first format from at least one server over the network; converting the standard APIs in the first format to a user interface API in a second format; and executing the user interface API in the second format to manipulate the object and generate further user interface output from the components and data in the object.

The Examiner cited col. 5, lines 53-59 of Galea as teaching the claim requirement of receiving a standard application program interfaces (API) that are a member of a set of standard APIs in a first format from at least one server over the network, where the APIs are converted to user interface APIs in a second format that are executed to manipulate the object and generate further user interface output from the components and data in the object. (Office Action, pg. 5)

The cited col. 5 mentions that a user accesses a server to access items for sale and downloads a configuration model. Galea mentions that the downloaded configuration model includes all valid information and possible configurations to allow the user to "view product detailed information without again accessing the server". (Galea, col. 5, line to col. 6, line 2)

Nowhere does the cited col. 5 anywhere teach or suggest receiving a standard API from the server as claimed. Instead, the cited col. 5 mentions that the user downloads a configuration model having all the possible ways to view the product information. The downloaded

configuration of Galea does not comprise the claimed APIs in a standard format that the server submits to control the user interface at the client.

Applicants further submit that the cited col. 5 teaches away from receiving APIs from a server to convert and then execute to manipulate the downloaded object and generate user interface output. Galea mentions that once the user downloads the initial model, they can view detailed product information without accessing the server. This teaches away from receiving APIs from the server that manipulate the previously downloaded user interface. Galea teaches away from receiving APIs from the server to control the user interface at the remote computer, because once the user downloads the compiled configuration model there is no need to download anything more because the user may access detailed product information without going to the server.

Further, the cited Galea also mentions that "once the compressed file is downloaded to client 106, all interaction between the user and elements are maintained within client 106. The client 106 does not interact with the server 102 unless the user selects a new service." (Galea, col. 7, lines 17-22) Again, this part of Galea teaches away from receiving standard APIs from the remote server to control the user interface because Galea teaches that the client user views information without interacting with the server. The claims require receiving standard APIs to manipulate the user interface, which is different from Galea's discussion of no need to further communicate with the server.

The Examiner cited col. 5, lines 55-59 and col. 11, lines 15-18 of Galea as teaching the claim requirement of converting the standard APIs in the first format to a user interface API in a second format, which can then manipulate the user interface. (Office Action, pg. 5).

The cited col. 5 mentions the user downloading the configuration model providing all possible ways to view the product. The cited col. 11 mentions how the client builds display pages based on the configuration.

Nowhere do the cited cols. 5 and 11 anywhere teach or suggest converting a standard API from a first format to a second format that can then be used to manipulate a user interface. The cited cols. 5 and 11 mentions how a user may select a configuration option to view the product information. However, there is no teaching in the cited Galea of converting the API from one format to another to control the user interface.

The Examiner cited col. 7, lines 17-22 and col. 10, lines 40-44 of Galea as teaching the claim requirement of executing the user interface API in the second format to manipulate the object and generate further user interface output from the components and data in the object. (Office Action, pg. 5) Applicants traverse.

The cited col. 7 mentions that the object may be updated in place by increasing the number of elements and that once the file is downloaded to the client all interaction of the user and the elements is maintained with the client and the client does not interact with the server unless the user at the client selects a new service or the purchase button. Again, this cited col. 7 teaches away from the claim requirement of executing an API from the server to manipulate the object because the cited col. 7 mentions that all interaction occurs at the client, with no interaction from the server.

The cited col. 10 mentions that a client applet updates display information as the user accesses the downloaded file. Again, nowhere does the cited cols. 7 or 10 anywhere teach or suggest executing an API from a server in a first format that is converted to a second format and executed to manipulate the object. The cited col. 10 only mentions that the client performs operations locally, there is no teaching in Galea of execution of an API from the server as claimed.

The Examiner cited col. 10, lines 25-43 and col. 11, lines 20-32 of Galea as teaching the claim requirement that the user interface output is controlled by the at least one remote server through the standard APIs sent by the at least one server over the network. (Office Action, pg. 5). Applicants traverse.

The cited col. 10 mentions that the client browser interacts with the server and downloads the compiled data file from the server and that a client applet reads the downloaded file and manipulates the data in the file and updates the display. Nowhere does the cited col. 10 anywhere teach or suggest that the user interface is controlled by a server through standard APIs sent from the server. Instead, as previously mentioned, in the cited col. 10, the client controls the user interface locally, not the server through standard APIs as claimed.

The cited col. 11 mentions that the pages are displayed and once the user selects the configuration operation the appropriate information is read from the compressed file and displayed. Again, with the cited col. 11 all manipulation of the file and GUI are done locally at

the client. Nowhere does the cited col. 11 anywhere tech or suggest that the user interface is controlled by standard APIs sent from the server.

The Examiner then suggested modifying Galea with the standard APIs discussed in Cover. Applicants submit that because the cited Galea nowhere discloses a server remotely manipulating a user interface at a remote computer, modifying the cited Galea to use standard APIs would not teach or suggest the claim requirements of the server sending standard APIs in a first format that the client converts to a second format to manipulate the user interface at the remote computer.

Accordingly, independent claims 1, 15, and 29 are patentable over the cited art because the cited combination does not teach or suggest all the claim requirements.

Claims 2, 4, 16, 18, 19, 30, 32, and 33 are patentable over the cited combination because they depend from claims 1, 15, and 29, which are patentable over the cited art for the reasons discussed above.

Independent claims 6, 20, and 34 concern controlling from a server user interface output on an output device attached to a remote computer, wherein the server and remote computer communicate over a network, comprising: transmitting from the server an object to the remote computer including user interface components and data, wherein the remote computer generates user interface output from the user interface components and data in the object; and transmitting from the server to the remote computer standard application program interfaces (API) that are a member of a set of standard APIs in a first format, wherein the remote computer converts the standard APIs in the first format to user interface APIs in a second format to manipulate the object and generate further user interface output from the components and data in the object.

The Examiner cited the same sections of Galea and Cover above as teaching the claim requirements that the remote computer converts the standard APIs in the first format to user interface APIs in a second format to manipulate the object and generate further user interface output from the components and data in the object. (Office Action, pgs. 5-6). Applicants traverse.

As discussed, the cited Galea discusses manipulating a file downloaded from a server to present information on a display. Nowhere does the cited Galea or Cover anywhere teach or suggest converting standard APIs in the first format to user interface APIs in a second format to

manipulate the object. For instance, nowhere does the cited Galea or Cover anywhere teach or suggest converting standard DOM interfaces to user interface APIs in a second format to manipulate the object. Moreover, as discussed with respect to claims 1, 15, and 29, nowhere does the cited Galea and Cover anywhere teach or suggest the claim requirements that the user interface output at the remote computer is controlled by the server through the standard APIs sent by the server over the network.

Accordingly, claims 6, 20, and 34 are patentable over the cited art for the reasons discussed with respect to the distinctions of claims 1, 15, and 29.

Claims 7-19, 21-33, and 35- 42 are patentable over the cited art because they depend either directly or indirectly from claims 6, 20, and 34, which are patentable over the cited art for the reasons discussed above. Moreover, certain of these dependent claims provide additional grounds of patentability over the cited art for the reasons discussed below.

Claims 7, 21, and 35 depend from claims 6, 20, and 34 and further require: generating a user interface at the server from a copy of the object transmitted to the remote computer; receiving input to control the user interface at the server; generating standard APIs in the first format to control the user interface according to the received input; and transmitting the generated standard APIs in the first format to the remote computer to control the user interface output generated at the remote computer.

The Examiner cited col. 7, lines 20-22 of Galea as teaching the claim requirements of generating a user interface at the server from a copy of the object transmitted to the remote computer. (Office Action, pg. 7) Applicants traverse.

The cited col. 7 mentions that the client does not interact with the server unless the user selects a new service or submits a purchase button. Nowhere does this cited col. 7 anywhere teach or suggest generating a user interface at a server from a copy of the object transmitted to the remote computer. In fact, the cited col. 7 teaches away from this requirement, because with the cited Galea everything happens locally at the client until the user selects a new service or purchase. The cited col. 7 does not suggest that the server generates a user interface from a copy of the object transmitted to the remote computer including user interface components.

Moreover, claims 7, 21, and 35 further require that in response to input received at the server, standard APIs in the first format are generated to control the user interface and that the

generated standard APIs in the first format are also transmitted to the remote computer to control the user interface generated at the remote computer. As discussed, the cited Galea teaches away from the server manipulating the remote computer or client user interface through standard APIs because the cited Galea mentions that the user at the client manipulate the file locally without interacting with the server until a purchase is made or new service requested.

Accordingly, claims 7, 21, and 35 provide additional grounds of patentability because the cited art does not teach the additional requirements of these claims.

Claims 8, 22, and 36 depend from claims 7, 21, and 35 and further require that the object includes images of a product, wherein the received input at the computer is to modify the presentation of the images of the product, and wherein the generated and transmitted standard APIs modify the presentation of the images of the product displayed in the generated user interface output at the remote computer.

The Examiner cited col. 5, lines 40-45 and co. 8, lines 20-23 of Galea as teaching the additional requirements of these claims. (Office Action, pg. 7) Applicants traverse.

The cited col. 5 discusses local or specific domain options, and whether or not and which corresponding images are to be displayed with each option selection, and whether or not an image is to be updated. The cited col. 8 mentions that the elements must be updated as the result of the last user selection, which occurs at the client.

The cited Galea discusses modifications that may occur locally at the client. Nowhere does the cited Galea mention a server transmitting standard APIs to modify the presentation of the images of the product displayed in the generated user interface at the remote computer. Instead, the cited Galea discusses how a user may modify the displayed GUI locally, not how a server may send standard APIs to manipulate the remote computer user interface. Nowhere does the cited Galea anywhere teach or suggest that input received at the server is used to modify the presentation of images of the product displayed at the remote computer.

Accordingly, claims 8, 22, and 36 provide additional grounds of patentability because the cited art does not teach the additional requirements of these claims.

Claims 9, 23, and 37 depend from claims 6, 20, and 34 and further require transmitting the object to additional remote computers and transmitting the standard APIs in the first format to the additional remote computers that received the object to manipulate the objects on all the

remote computers and control the generation of user interface output on the remote computers. The Examiner cited col. 5, lines 53-59 and the standard APIs of Cover (pg. 1) as teaching the additional requirements of these claims. (Office Action, pg. 7) Applicants traverse.

The cited col. 5 mentions that the user accesses the server through a client and that the product or service configuration domain is compiled into a compressed file sent to the client.

Although, the cited Galea arguable could send its file to multiple clients, nowhere does the cited Galea anywhere teach or suggest transmitting standard APIs to additional remote computers to manipulate the user interface output on the remote computers. Instead, the cited Galea teaches away from the server manipulating the client user interfaces because Galea mentions the user at the client accesses the downloaded file to display information without interacting with the user.

Nowhere does the Cover and Galea anywhere teach or suggest that an object is sent to multiple remote computers and that standard APIs are sent to the additional remote computer to manipulate the objects on all the remote computers to control user interface output on the remote computers.

Accordingly, claims 9, 23, and 37 provide additional grounds of patentability because the cited art does not teach the additional requirements of these claims.

Claims 10, 24, and 38 depend from claims 9, 23, and 37 and further require: receiving, at the server, input from one of the remote computers to manipulate the object to modify the user interface output; generating, with the server, standard APIs to implement the manipulations to the object indicated in the received input; and transmitting the generated standard APIs to the remote computers to implement the manipulations of the object on the remote computers. The Examiner cited col. 7, lines 20-22 of Galea as teaching the additional requirements of these claims. (Office Action, pg. 7) Applicants traverse.

The cited col. 7 mentions that the client does not interact with the server unless the user selects a new service or submits a purchase button. Nowhere does this cited col. 7 anywhere teach or suggest the claim requirement of generating at the server standard APIs to manipulate the object in response to input from one remote computer and then transmitting the generated standard APIs to remote computers to implement the manipulation fo the object. These steps are nowhere taught or remotely mentioned in the cited art.

Accordingly, claims 10, 24, and 38 provide additional grounds of patentability because the cited art does not teach the additional requirements of these claims.

The Examiner rejected claims 3, 17, and 31 as obvious over Galea, Cover and Broulik (U.S. Patent No. 6,323,881).

Applicants submit that these claims are patentable over the cited art because they depend from one of claims 1, 15, and 29, which are patentable over the cited art for the reason discussed above.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-42 are patentable over the art of record. Applicants submit that no additional fees are needed. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460. The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

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